

**RESPONSE TO OMNIBUS OBJECTION TO CLAIM**

**UNITED STATES BANKRUPTCY COURT**

**FOR THE SOUTHERN DISTRICT OF NEW YORK**

**In re: ) Chapter 11 VOYAGER DIGITAL HOLDINGS, INC., et al.,1 )**

**Case No. 22-10943 (MEW)Debtors. ) (Jointly Administered))**

**CREDITOR RESPONSE TO OBJECTION:**

*DEBTORS' OMNIBUS OBJECTION TO (I) THE VOTING AMOUNT*

*ASSOCIATED WITH CERTAIN DISPUTED ACCOUNT HOLDER CLAIMS*

*AND (II) THE MERITS OF CERTAIN DISPUTED ACCOUNT HOLDER CLAIMS*

**Creditor Benjamin Fleck, Claim 2891, claim reference VOY-11489**

**Filed by Benjamin Fleck, Pro Se Creditor**

**Creditor asks that the court in the case of Creditor Benjamin Fleck, for any claims including at minimum Claim 2891 Claim Reference VOY-11489 deny the omnibus objection as it relates to Benjamin Fleck, and the related order debtor proposes seeking relief, and schedule a hearing to hear the objection on the merits.**

In the courts August 4th 2022 order, Debtor was granted authority to liquidate positions to satisfy any negative balances. The key portion of that order is below:

Liquidating Cryptocurrency and Sweeping Cash from Third-Party Exchanges

12. Accordingly, the Debtors seek authority, but not direction, to continue liquidating cryptocurrency from negative customer accounts in the ordinary course of business and consistent with past practice prior to the Freeze Date. In connection with liquidating cryptocurrency, the Debtors also seek authority to sweep cryptocurrency related to negative accounts that have been liquidated prior to the Petition Date into the Debtors' operating accounts. Such cash is currently being held at the various third-party exchanges, including, among others, Coinbase Trust Company, LLC.

Claim amount pre-liquidation:

BITCOIN (BTC): 0.01154 LUNACLASSIC (LUNC): 10.2 USDCOIN (USDC): 132.35 VOYAGERTOKEN (VGX):  
511.76

Debtor did not liquidate cryptocurrency to satisfy a negative balance consistent with past practice prior to the freeze date. That practice would involve an actual liquidation, crediting against any negative balance at the price fetched in the market for liquidated assets. Creditor can demonstrate, and debtor cannot refute that this was not the process used on October 31st 2022 or on any other date.

Creditor has diligently contacted debtors attorneys at the phone numbers and emails provided in the "Resolving Objections" section of their omnibus objection. They provide one non-functional phone number (disconnected), one phone number that is never answered and has a voicemail box that is full, and two email addresses to which timely emails are not returned by Debtors attorneys, Kirkland.

Granting the relief debtors seek in their objection, will deprive thousands of individual creditors the ability to resolve the objections, and the Southern District of New York Bankruptcy Court does not allow for electronic filing for non-attorney filers. Debtor is benefited by these conditions, and may expect many meritorious responses to be unheard and unfiled.

Credit requests a hearing date to provide the court with testimony and documentation, and in hopes a scheduled hearing will result in a response from the debtor, which may save the court time in allowing both parties to reach a stipulated agreement.

I welcome the debtor to contact me at their convenience.

Benjamin Fleck

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